BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Regulation of the : Purchased Gas Adjustment Clauses : Contained within the Rate Schedules of :

Northeast Ohio Natural Gas Corporation :

and Orwell Natural Gas Company.

In the Matter of the Regulations of the : Purchased Gas Adjustment Clauses : contained within the Rate Schedules of : Northeast Ohio Natural Gas Corporation :

and related matters.

In the Matter of the Uncollectible Expense

Rider of Orwell Natural Gas Company.

Case No. 12-0209-GA-GCR

Case No. 12-0212-GA-GCR

Case No. 12-0309-GA-UEX

Case No. 12-0312-GA-UEX

EXPEDITED MOTION FOR EXTENSION OF THE PROCEDURAL SCHEDULE

Pursuant to Ohio Administrative Code ("O.A.C.") 4901-1-12(A),(C) and 4901-1-13(A), Orwell Natural Gas Company ("Orwell") and Northeast Ohio Natural Gas Corporation ("Northeast") (collectively, the "Companies") respectfully request an extension of the procedural schedule in the above-captioned proceeding. Specifically, the Companies request that the hearing currently scheduled for April 30, 2013 be continued until July 8, 2013. The Companies also request an expedited ruling on this Motion pursuant to Rule 4901-1-12(C), O.A.C. The Ohio Attorney General's Office ("OAG"), on behalf of the Public Utilities Commission of Ohio ("Commission"), and the Ohio Consumers' Counsel have indicated their support to extend the procedural schedule; however, at the time of filing this motion, the OAG has not confirmed its availability for the July 8, 2013 hearing date. The reasons in support of this Motion are fully set forth in the accompanying Memorandum in Support.

Respectfully submitted,

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MEMORANDUM IN SUPPORT

This proceeding was initiated on January 23, 2012 by Entry of the Commission initiating the Gas Cost Recovery financial audits of Orwell and Northeast, pursuant to R.C. 4905.302 and O.A.C. 4901:1-14-07. On January 23, 2013, the Attorney Examiner issued an Entry scheduling the hearing in this proceeding for April 30, 2013. On February 28, 2013, the Commission Staff issued its Financial Audits of the Gas Cost Recovery Mechanisms for Orwell and Northeast.

The Parties to this proceeding all support an extension of the procedural schedule. Orwell and Northeast respectfully request an extension of the hearing date to July 8, 2013. Accordingly, if this motion is granted, Orwell and Northeast will publish notice of the hearing in this case in accordance with the January 23, 2013 Entry issued by the Attorney Examiner. At the time of filing this motion, the OAG has not confirmed its availability of the July 8, 2013 date.

Additionally, Orwell and Northeast request that the Commission issue an expedited ruling on this motion.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of *Orwell Natural Gas Company and Northeast Ohio Natural Gas Company's Expedited Motion for Continuance* was served this 26th day of April, 2013 by electronic mail upon the following:

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Case No(s). 12-0209-GA-GCR, 12-0212-GA-GCR, 12-0309-GA-UEX, 12-0312-GA-UEX

Summary: Motion Expedited Motion for Extension of the Procedural Schedule electronically filed by Mr. Zachary D. Kravitz on behalf of Northeast Ohio Natural Gas Corporation and Orwell Natural Gas Company